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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

JANE CRUDUP,)
Plaintiff,)
Case No.
v.) 8:21CV0045
THE CITY OF OMAHA,)
Defendant.)
TAKEN IN BEHALF
OF DEFENDANT

APPEARANCES:

Mr. Potso Mahlangeni-Byndon
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For Plaintiff

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For Defendant

DEPOSITION OF JANE CRUDUP, taken at
10:00 a.m. on April 13, 2022, Deanna L. Maley,
RMR, CRR, and General Notary Public in and for
the State of Nebraska, at 1905 Harney Street, 4th
Floor, Omaha, NE.

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DIRECT - JANE CRUDUP (Peters)

67

1 telling her no, I'm not okay. Like, I'm not
2 okay, I don't understand this, I'm not okay, how
3 can they hang my stuff.

4 Then he came -- I'm steady talking
5 and he's like, hey, Jane, how you doing? I said,
6 no, like don't talk to me after this. Like are
7 you serious? Don't talk to me after this. I
8 don't understand why y'all think this is cool.
9 He's like, what do you mean? I said no, no. And
10 so I text -- I text Almond. I text Terrence
11 Almond.

12 Q. So he wasn't on duty that day?

13 A. He had -- he had been moved.

14 Q. Okay.

15 A. He had been moved probably months
16 prior.

17 Q. And what did you text Firefighter
18 Almond?

19 A. I said -- I can't quite recall, but I
20 pretty much was like something about them hanging
21 my -- hanging my stuff. I was like this is -- I
22 pretty much told him, I was like this is -- this
23 is some white-boy stuff. I said, how they going
24 to hang my stuff?

25 Then I text Sheena, and I said I

DIRECT - JANE CRUDUP (Peters)

83

1 A. I'm a preloader now.

2 Q. Preloader. Tell me what that job
3 entails.

4 A. Just load the brown trucks that goes
5 out.

6 Q. How many hours per week on average do
7 you work?

8 A. Probably about 25, 27. Probably
9 about 27.

10 Q. And what is your rate of pay?

11 A. I don't know if it was 21 something,
12 22 something.

13 Q. Per hour?

14 A. Yes.

15 Q. Do you want to go back to the fire
16 department?

17 A. I don't know. I'm still working on,
18 like, just feeling safe and feeling like I can
19 trust the individuals that I'm working around
20 24 hours a day.

21 Q. What, if anything, could the City of
22 Omaha do to make you feel safe in coming back to
23 work?

24 A. I don't know. It's like -- I just
25 feel like coming back from something -- like

DIRECT - JANE CRUDUP (Peters)

84

1 mental harm is so hard to get over. And so for
2 me it's like, okay, yeah, I wanted to do that
3 particular job, but when you're failed at....

4 Q. That's okay. Take your time. We can
5 go off the record for a bit if you need to.

6 MS. PETERS: This might be a good
7 time just to take a break.

8 MR. BYNDON: Yeah.

9 (A short recess was taken from
10 11:51 a.m. to 11:59 a.m., and the requested
11 portion of the testimony was read back at
12 page 83, line 21.)

13 BY MS. PETERS:

14 Q. And if you feel comfortable answering
15 that question, if not we'll move on.

16 A. So I would say -- and I don't know
17 really, because I feel like I've been failed at
18 various levels as much as -- as much as everyone
19 say they don't know or they didn't know what
20 happened. Like, this is branching off, like, I
21 had individuals that I never told about the
22 situation coming to me talking to me about the
23 situation within the station. They also told me,
24 oh, you have a new station. Well, how do you
25 know that? Somebody at central -- the main